

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE PFIZER INC. SECURITIES LITIGATION

No. 04-cv-9866 (LTS)(HBP)

ECF CASE

**PLAINTIFFS' NOTICE OF MOTION AND MOTION FOR FINAL
APPROVAL OF CLASS ACTION SETTLEMENT AND PLAN OF ALLOCATION**

PLEASE TAKE NOTICE that, pursuant to the Court's September 16, 2016 Order Preliminarily Approving Settlement, Directing Notice to Class Members, and Setting Hearing for Final Approval of Settlement (ECF No. 703, the "Preliminary Approval Order"), on December 21, 2016, at 10:00 a.m. in Courtroom 12D of the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, the Honorable Laura Taylor Swain presiding, Lead Plaintiff Teachers' Retirement System of Louisiana ("Lead Plaintiff" or "TRSL"), and additional Court-appointed class representatives Christine Fleckles, Julie Perusse and Alden Chace (collectively with Lead Plaintiff, "Plaintiffs" or "Class Representatives"), on behalf of themselves and the Court-certified Class, will and hereby do, move for final approval of the proposed class action settlement which, if approved, would resolve this Action in its entirety, and for approval of the proposed Plan of Allocation.

This Motion is based upon the Memorandum of Law in Support of Plaintiffs' Motion For Final Approval of Class Action Settlement and Plan of Allocation, the Declaration of Charles T. Caliendo In Support of Motion For Final Approval of Class Action Settlement and Plan of Allocation, and Motion For An Award of Attorneys' Fees and Reimbursement of Expenses ("Caliendo Decl."),¹ the exhibits thereto, the record and proceedings in this Action, and such other matters as the Court may consider at the time of the hearing.

Certification Pursuant to Individual Practices

Pursuant to Section A(2)(b)(ii) of the Individual Practices of Judge Laura Taylor Swain (effective for all cases on or after September 14, 2015), Lead Plaintiff certifies that it is aware of objections to this Motion. The deadline for Class Members to file objections is November 28,

¹ All initial capitalized terms not defined herein have the meanings as defined in the Caliendo Decl. and the Stipulation and Agreement of Settlement dated August 26, 2016 (*see* ECF No. 700, Ex. 1).

2016. As of November 10, 2016, out of the millions of Notices that have been mailed, there have been 10 objections submitted in connection with the Settlement. Caliendo Decl. ¶120. As provided in the Preliminary Approval Order, and in the interests of judicial economy, Lead Counsel will file reply papers on December 6, 2016 that will address all objections received. ECF 703, ¶ 15.

Dated: November 11, 2016

Respectfully submitted,

GRANT & EISENHOFER P.A.

Additional Counsel:

**KESSLER TOPAZ MELTZER
& CHECK, LLP**

David Kessler
Andrew L. Zivitz
Matthew L. Mustokoff
Michelle M. Newcomer
280 King of Prussia Road
Radnor, PA 19087
Telephone: (610) 667-7706
Facsimile: (610) 667-7056

*Counsel for Plaintiffs Christine Fleckles,
Julie Perusse and Alden Chace*

By /s/ James J. Sabella
Jay W. Eisenhofer
Richard S. Schiffrin
James J. Sabella
Charles T. Caliendo
485 Lexington Avenue, 29th Floor
New York, NY 10017
Telephone: (646) 722-8500
Facsimile: (646) 722-8501

Mary S. Thomas
123 Justison Street
Wilmington, DE 19801
Telephone: (302) 622-7000
Facsimile: (302) 622-7100

Lead Counsel for Plaintiffs